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6 *Attorney for Plaintiff*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 WEI LIU,

10 Plaintiff,

11 vs.

12 MANDALAY BAY, LLC dba MANDALAY BAY  
13 RESORT AND CASINO and MGM RESORTS  
14 INTERNATIONAL

15 Defendants.

CASE NO: 2:23-cv-01435-CDS-MDC

JOINT (PROPOSED) STIPULATED  
DISCOVERY PLAN & SCHEDULING  
ORDER

SUBMITTED IN COMPLIANCE WITH  
LR 26-1(b)

16 A discovery conference in which all parties of record participated in the meeting required  
17 under Fed. R. Civ. P. 26(f) was held on **September 5, 2024**. Pursuant to Fed. R. Civ. P. 26(f) and  
18 LR II 26-1, the parties do hereby stipulate to the following discovery plan and scheduling order.

19 1. **Initial Disclosures:** The parties have agreed to exchange initial disclosures by **September**  
20 **18, 2024**, pursuant to Fed. R. Civ. P. 26(f).

21 2. **Subject of Discovery:** Unless otherwise limited by subsequent stipulations, the parties shall  
22 be allowed to conduct discovery to the full extent permitted under the Federal Rules of Civil  
23 Procedure. The parties agree that for any discovery request requiring a party to conduct a search of  
24 an electronic database, the party requesting discovery shall supply the search terms. The foregoing,  
25 however, does not constitute a waiver of any objections which may be interposed as to any  
26 discovery request.

1       3.     **Discovery Cut-Off Date(s): December 23, 2024**, as December 22, 2024 is a Sunday which  
2     is not later than 180 days from **June 25, 2024**, the date that Defendant filed its Motion to Dismiss  
3     Plaintiff's Second Amended Complaint.

4       4.     **Amending the Pleadings and Adding Parties:** The last day to file motions to amend  
5     pleadings or to add parties is **September 24, 2024**, which is not later than ninety (90) days prior to  
6     the close of discovery.

7       5.     **Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):** The disclosure of experts and expert  
8     reports shall occur by **October 24, 2024**, which is not less than sixty (60) days before the discovery  
9     deadline. Disclosure of rebuttal experts and their reports shall occur by **November 25, 2024** as  
10    November 23, 2024 is a Saturday which is not later than thirty (30) days before the discovery  
11    deadline.

12       6.     **Dispositive Motions:** Dispositive motions may be filed no later than **January 22, 2025**,  
13     which is not later than thirty (30) days after the discovery deadline. In the event that the discovery  
14     period is extended from the discovery cut-off date set forth in this Joint Discovery Plan and  
15     Scheduling Order, the date for filing dispositive motions shall be extended for the same duration, to  
16     be no later than thirty (30) days from the subsequent discovery cut-off date.

17       7.     **Pretrial Order:** The pretrial order shall be filed by **February 21, 2025**, which is not later  
18     than thirty (30) days after the date set for filing dispositive motions. In the event dispositive  
19     motions are filed, the date for filing the joint pretrial order shall be suspended until thirty (30) days  
20     after the decision of the dispositive motions or until further order of the Court. In the further event  
21     that the discovery period is extended from the discovery cut-off date set forth in this Joint  
22     Discovery Plan and Scheduling Order, the date for filing the joint pretrial order shall be extended in  
23     accordance with the time period set forth in this paragraph.

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1       8. **Extensions or Modifications of the Discovery Plan and Scheduling Order:** LR 26-4  
2 governs modifications or extensions of this discovery plan and scheduling order.

3       9. **Fed. R. Civ. P. 26(a)(3) Disclosures:** The disclosures required by Fed. R. Civ. P. 26(a)(3),  
4 and any objections thereto, shall be included in the pretrial order.

5       10. The attorneys of record in this matter are registered for electronic filing with this Court.  
6 Any documents electronically filed with this Court are deemed to be sufficiently served on the other  
7 party as of the date that the document is electronically filed with the Court.

8       11. **Alternative dispute-resolution:** The parties certify that they met and conferred about the  
9 possibility of using alternative dispute-resolution processes including a settlement conference or  
10 mediation. The parties agree that this matter is appropriate for Early Neutral Evaluation, mediation  
11 or a settlement conference once some discovery has been conducted.

12       12. **Trial by a magistrate judge:** The parties certify that they considered consent to trial by a  
13 magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial  
14 Program (General Order 2013-01). At this time, the parties do not consent to a trial by the  
15 magistrate judge or the use of the Short Trial Program.

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1       13. **Electronic Evidence:** The parties certify that they discussed whether they intend to present  
2 evidence in electronic format to jurors for the purposes of jury deliberations. The parties have  
3 agreed to produce electronically-stored evidence in either paper or .pdf format, absent a showing of  
4 good cause for such evidence to be produced in native format.

5       Dated this 17<sup>th</sup> day of September, 2024.

6       Dated this 17<sup>th</sup> day of September, 2024.

7       **HATFIELD & ASSOCIATES, LTD.**

8       */s/ Trevor J. Hatfield*

9       By: \_\_\_\_\_  
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16       **MGM RESORTS INTERNATIONAL**

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27      Attorneys for Defendants

28       **ORDER**

1       IT IS SO ORDERED.

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3       UNITED STATES MAGISTRATE JUDGE  
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**CERTIFICATE OF SERVICE**

I certify that on the 17<sup>th</sup> day of September 2024, I electronically filed the foregoing **JOINT  
(PROPOSED) STIPULATED DISCOVERY PLAN & SCHEDULING ORDER PURSUANT  
TO FRCP 26(f)** with the Clerk of the Court using the ECF system which served the parties hereto  
electronically.

DATED: September 17, 2024

By: /s/ Trevor J. Hatfield  
An employee of Hatfield & Associates, Ltd.